



250 Vesey Street
27th Floor
New York, NY 10281

wmhwlaw.com
T: 212-335-2030
F: 212-335-2040

July 7, 2025

Via ECF

The Honorable Marcia M. Henry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Blain v. State University of New York Downstate Medical Center et al.**
Case No. 22-cv-03022-FB-MMH

Dear Judge Henry,

We represent Plaintiff Dr. Stacy Blain in the above-referenced matter. We, along with counsel for the Defendants, write jointly to provide the Court with a status update regarding the progress of discovery.

On March 3, 2025, the Parties requested an extension of the discovery deadlines in this matter and filed a Proposed Discovery Plan, which, among other things, called for a joint status report to be due on July 7, 2025. *See* ECF No. 150. On April 8, 2025, following a status conference, the Court granted that request and ordered that “[f]act discovery shall be completed by 06/30/2025 and a joint status report confirming the end of fact discovery shall be filed by 07/07/2025.” *See* ECF No. 152. On June 12, 2025, the parties requested a further extension of fact discovery from June 30, 2025 to September 30, 2025 to accommodate scheduled vacations and other scheduling problems caused by the academic calendar. *See* ECF No. 154. As explained in the letter, the State Defendants were scheduled to depose Plaintiff on June 17, 2025, Plaintiff was scheduled to depose five fact witnesses between June 23 and July 8, 2025, and Plaintiff intends to depose five additional witnesses. *Id.* On June 20, 2025, the Court granted the extension of fact discovery deadlines and ordered that “[a]ll other deadlines in the 04/08/2025 Discovery Order (ECF No. 152) remain in effect.” *See* Order, dated June 20, 2025.

Since the June 12, 2025 letter, the Parties have conducted—or, with respect to the deposition scheduled for tomorrow, July 8, 2025, will conduct—the depositions described in the June 12, 2025 letter. The Parties are working to schedule the remaining depositions.

Thank you for your Honor’s attention to this matter.

Sincerely,

Milton L. Williams
Attorney for Plaintiff Stacy Blain